

BRENNEKE DECLARATION
EXHIBIT L

From: adrienne.scheffey@akerman.com
To: [Brenneke, Andrea \(ATG\)](#); colin.barnacle@akerman.com; joan@3brancheslaw.com; whitehead@sgb-law.com
Cc: [Chien, Marsha \(ATG\)](#); [Polozola, Lane \(ATG\)](#); [Hall, Caiti \(ATG\)](#); joe@3brancheslaw.com
Subject: RE: Washington v. The GEO Group, Inc. - Renewed Request for Partially Unredacted Exhibit 365 and Underlying Spreadsheets/Calculations Related to NWDC
Date: Monday, August 03, 2020 11:43:04 AM

All,

Our team is tied up with other matters in the coming days. Please let us know the State's availability to confer about this issue and the confidentiality issue this Friday between 1:00 and 3:00 MST. If the State is not available at that time, please let us know your availability on Monday, August 10th. For the confidentiality issue, please provide us with your proposed solution for the documents marked confidential, including how the State proposes handling those exhibits if the trial is streamed live online.

Best,

Adrienne Scheffey

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Profile



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From: Brenneke, Andrea (ATG) <andrea.brenneke@atg.wa.gov>
Sent: Monday, August 3, 2020 12:38 PM
To: Scheffey, Adrienne (Assoc-Den) <adrienne.scheffey@akerman.com>; Barnacle, Colin (Ptnr-Den) <colin.barnacle@akerman.com>; Joan Mell <joan@3brancheslaw.com>; Whitehead, Jamal (whitehead@sgb-law.com) <whitehead@sgb-law.com>
Cc: Chien, Marsha (ATG) <marsha.chien@atg.wa.gov>; Polozola, Lane (ATG) <Lane.Polozola@ATG.WA.GOV>; Hall, Caiti (ATG) <Caiti.Hall@atg.wa.gov>; 'Joe Fonseca' <joe@3brancheslaw.com>
Subject: Washington v. The GEO Group, Inc. - Renewed Request for Partially Unredacted Exhibit 365

and Underlying Spreadsheets/Calculations Related to NWDC

Dear Counsel,

We hope you are safe and well.

We previously met and conferred about the production of Trial Exhibit 365 without redaction of the portion regarding GEO's calculations of the amount it would take to comply with detainee Minimum Wage demands and the underlying spreadsheets/calculations related to the NWDC. GEO refused to produce those.

We renew our request for those documents now that we have the benefit of Brian Evan's testimony on the subject that demonstrate their relevance and responsiveness to Washington's discovery requests. Please produce these documents by close of business Wednesday, August 5, 2020 or we will seek the Court's intervention.

Also, just to confirm, as we made clear in our response to GEO's MIL, we do NOT seek information or redactions regarding GEO's attorneys fees and costs that also were contained in that letter.

We are attaching Trial Exhibit 365, filed at ECF 362-1_Ex. A, for your convenience.

Very truly yours,

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